## STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY	)	
d/b/a AmerenCPS	)	
	)	
Petition for a Certificate of Public Convenience and	)	No. 07-0532
Necessity, pursuant to Section 8-406 of the Illinois Public	)	
Utilities Act; to construct, operate and maintain a new	)	
138,000 volt electric lines in Madison County, Illinois	)	

## REPLY TO STAFF'S RESPONSE TO AMEREN'S MOTION FOR EXPEDITED SCHEDULE FOR BRIEFS ON EXCEPTIONS

COMES NOW WRB Refining, LLC., ("WRB") and for its reply to Staff's Response to Ameren's Motion for an Expedited Briefing Schedule for the Briefs on Exception in this case, state as follows:

- 1. WRB Refining, LLC was in support of Ameren's Motion.
- 2. The case at bar was initiated by Ameren on October 29, 2007 by petition of Central Illinois Public Service Company, d/b/a AmerenCIPS, seeking a certificate of public convenience and necessity pursuant to Section 8-406 of the Public Utilities Act. WRB intervened in this matter on November 30, 2007. WRB supported Ameren's request for a certificate of convenience and necessity to build two new 138 kV transmission lines to feed its Wood River, Illinois refinery, which it deemed as necessary to support the continuing safe operation of the refinery as well as the expansion of the refinery planned for 2009. It is now 2009 and the expansion is underway, but cannot be completed until the electrical facilities that are the subject of the Ameren petition have themselves been completed.
- 3. Unnecessary delay in the resolution of this proceeding adds to the cost of the improvements and expansions being made at the Wood River, Illinois refinery.

WHEREFORE, the Ameren Motion for Expedited Briefing Schedule should be granted in this proceeding.

Respectfully submitted,

Eric Robertson

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## **PROOF OF SERVICE**

STATE OF ILLINOIS

SS

COUNTY OF MADISON

I, Eric Robertson, being an attorney admitted to practice in the State of Illinois and one of the attorneys for WRB Refining, LLC, herewith certify that I did on the 10th day of February, 2009, electronically file with the Illinois Commerce Commission, WRB Refinings, Reply to Staff's Response to Ameren's Motion for Expedited Schedule for Briefs on Exceptions, and electronically served same upon the persons identified on the Commission's official service list.

Eric/Robertson

Lueders, Robertson & Konzen

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SUBSCRIBED AND SWORN to me, a Notary Public, on this 10th day of February, 2009.

Notary Public

66384.1

"OFFICIAL SEAL"
BARBARA BRANDT
NOTARY PUBLIC—STATE OF ILLINOIS
MY COMMISSION EXPIRES JULY 7, 2011